

DUPLICATE

JUN 04 2024

KEVIN P. WEIMER, Clerk
By: *com* Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

JAMES VEREEN, A/K/A BONE;

Criminal Indictment

No. 1:23-CR-229

(First Superseding)

Under Seal

THE GRAND JURY CHARGES THAT:

Count One

**(Conspiracy to Possess with Intent to Distribute Controlled Substances
21 U.S.C. § 846)**

Beginning on a date unknown, but at least as of in or about January 2022, and continuing until on or about July 11, 2023, in the Northern District of Georgia and elsewhere, the defendants,

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JAMES VEREEN, A/K/A BONE,

did knowingly and willfully combine, conspire, confederate, agree and have a tacit understanding with each other, and with others known and unknown to the Grand Jury, to violate Title 21, United States Code, Section 841(a)(1), that is, to knowingly and intentionally possess with intent to distribute controlled substances, said conspiracy involving:

- at least five kilograms of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, pursuant to Title 21, United States Code, Section 841(b)(1)(A), as to defendants [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] AND JAMES VEREEN, A/K/A BONE,
 - at least 40 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance, pursuant to Title 21,

United States Code, Section 841(b)(1)(B), as to defendant [REDACTED]

[REDACTED],

- at least 500 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, pursuant to Title 21, United States Code, Section 841(b)(1)(B), as to defendants [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED],
- a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, pursuant to Title 21, United States Code, Section 841(b)(1)(C), as to defendant [REDACTED], and
- a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance, pursuant to Title 21, United States Code, Section 841(b)(1)(C), as to defendant [REDACTED],

all in violation of Title 21, United States Code, Section 846.

A large black rectangular redaction box covers the majority of the page content, from approximately y=107 to y=885. The redaction is composed of several horizontal bars of varying lengths, creating a stepped effect. There are also some vertical lines and a small rectangular cutout in the center of the main redacted area.

A large black rectangular redaction box covers the majority of the page content, from approximately y=107 to y=890. The redaction is positioned in the center of the page, leaving a white margin on all sides.

The image consists of a grid of horizontal black bars of varying lengths. The bars are arranged in approximately 15 rows. In the center column, there are two distinct clusters of bars. The top cluster is located around the middle of the grid, consisting of a long bar at the top, a shorter bar below it, and a very short bar positioned above the shorter one. The bottom cluster is located near the bottom of the grid, consisting of a long bar at the bottom, a shorter bar below it, and a very short bar positioned above the shorter one. The other rows consist of single horizontal bars of varying lengths.

The image consists of numerous horizontal black bars of varying lengths, arranged in a grid-like pattern. These bars represent redacted text, obscuring approximately 80-90% of the original content. The bars are set against a white background.

| Category | Frequency |
|----------|-----------|
| 0 | ~98 |
| 1 | ~95 |
| 2 | ~15 |
| 3 | ~18 |
| 4 | ~12 |
| 5 | ~10 |
| 6 | ~15 |
| 7 | ~18 |
| 8 | ~12 |
| 9 | ~10 |
| 10 | 0 |

The image consists of a grid of black horizontal bars of varying lengths and positions on a white background. The bars are arranged in approximately 10 rows. Some rows contain a single long bar, while others contain shorter bars or gaps. The pattern suggests a heavily redacted document where text has been completely obscured by black ink.

| Category | Count |
|----------|-------|
| 0 | ~98 |
| 1 | ~10 |
| 2 | ~10 |
| 3 | ~10 |
| 4 | ~10 |
| 5 | ~10 |
| 6 | ~10 |
| 7 | ~10 |
| 8 | ~10 |
| 9 | ~10 |

Count Twelve

**(Possession with Intent to Distribute Controlled Substance
21 U.S.C. § 841(a)(1))**

On or about April 11, 2023, in the Northern District of Georgia and elsewhere,
the defendants,

[REDACTED], AND
JAMES VEREEN, A/K/A BONE,

aided and abetted by each other, and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute a

controlled substance, said act involving at least five kilograms of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, pursuant to Title 21, United States Code, Section 841(b)(1)(A), all in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

The image consists of a grid of horizontal black bars of varying lengths. The bars are arranged in approximately 15 rows. Each row contains several bars, with some rows having more bars than others. The lengths of the bars vary significantly, with many being very long and others being very short. There is no discernible pattern or meaning to the arrangement.

| Category | Frequency |
|----------|-----------|
| A | ~950 |
| B | ~900 |
| C | ~780 |
| D | ~750 |
| E | ~720 |
| F | ~700 |
| G | ~750 |
| H | ~780 |
| I | ~750 |
| J | ~650 |

A bar chart illustrating the distribution of 1000 samples across 10 categories. The x-axis represents the sample index, ranging from 1 to 1000. The y-axis represents the category index, ranging from 1 to 10. The bars are black and have varying widths, indicating the magnitude of each sample's contribution to its respective category.

| Category | Approximate Sample Range |
|----------|---------------------------|
| 1 | 100-200, 400-500, 700-800 |
| 2 | 100-200, 400-500, 700-800 |
| 3 | 100-200, 400-500, 700-800 |
| 4 | 100-200, 400-500, 700-800 |
| 5 | 100-200, 400-500, 700-800 |
| 6 | 100-200, 400-500, 700-800 |
| 7 | 100-200, 400-500, 700-800 |
| 8 | 100-200, 400-500, 700-800 |
| 9 | 100-200, 400-500, 700-800 |
| 10 | 100-200, 400-500, 700-800 |

A large black rectangular redaction box covers the majority of the page content, from approximately y=107 to y=886. The redaction is composed of several horizontal bars of varying lengths, with some vertical gaps between them. There are also two distinct clusters of shorter horizontal bars: one centered around y=300 and another centered around y=750.

A large black rectangular redaction box covers the top portion of the page, obscuring several lines of text. The redaction is composed of multiple horizontal bars of varying lengths, creating a stepped effect. Below this main redaction, there are several individual horizontal bars of different lengths scattered across the page, likely representing redacted names or other identifying information.

| Term | Percentage |
|------------------|------------|
| Mental Health | ~95% |
| Psychosis | ~90% |
| Schizophrenia | ~85% |
| Bipolar disorder | ~80% |
| Depression | ~75% |
| Anxiety | ~70% |

**Count Twenty-Six
(Money Laundering Conspiracy
18 U.S.C. § 1956(h))**

Beginning on a date unknown, but at least as of in or about January 2022, and continuing until in or about July 2023, in the Northern District of Georgia and elsewhere, the defendants,

[REDACTED], AND
JAMES VEREEN, A/K/A BONE,

did knowingly combine, conspire, confederate, agree and have a tacit understanding with each other and with others known and unknown to the Grand Jury, to commit certain offenses under Title 18, United States Code, Sections 1956 and 1957, as follows:

- to knowingly conduct and attempt to conduct financial transactions in and affecting interstate and foreign commerce, which transactions involved the proceeds of a specified unlawful activity, that is, the distribution of controlled substances, and, while conducting and

attempting to conduct such financial transactions, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing the transactions were designed in whole and in part, to conceal and disguise the nature, source, ownership, and control of proceeds of such specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), and

- to knowingly engage in a monetary transaction by, through, and to financial institutions, affecting interstate commerce and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, the distribution of controlled substances, in violation of Title 18, United States Code, Section 1957,

all in violation of Title 18, United States Code, Section 1956(h).

A large black rectangular redaction box covers the majority of the page content, from approximately y=117 to y=885. The redaction is composed of several horizontal bars of varying lengths, creating a stepped effect. There are also two smaller, separate black rectangular areas located near the center of the page, one above the other, which appear to be redacting specific sections of text.

A bar chart showing the distribution of 1000 samples across 15 categories. The y-axis has labels 1 through 15. The x-axis ranges from 0 to 1000.

| Category | Value |
|----------|-------|
| 1 | ~100 |
| 2 | ~100 |
| 3 | ~100 |
| 4 | ~100 |
| 5 | ~100 |
| 6 | ~100 |
| 7 | ~100 |
| 8 | ~100 |
| 9 | ~100 |
| 10 | ~100 |
| 11 | ~100 |
| 12 | ~100 |
| 13 | ~100 |
| 14 | ~100 |
| 15 | ~100 |

Prior Conviction Notice

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The image consists of a series of horizontal black bars of varying lengths, arranged vertically. The bars are solid black and have thin white borders. They are positioned against a white background. The lengths of the bars vary, with some being full-width and others being shorter, creating a visual pattern.

| Statement | Percentage |
|-----------|------------|
| 1 | 98% |
| 2 | 98% |
| 3 | 98% |
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| 5 | 98% |
| 6 | 98% |
| 7 | 98% |
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| 91 | 98% |
| 92 | 98% |
| 93 | 98% |
| 94 | 98% |
| 95 | 98% |
| 96 | 98% |
| 97 | 98% |
| 98 | 98% |
| 99 | 98% |
| 100 | 98% |

Before the defendant, JAMES VEREEN, A/K/A BONE, committed the offenses charged in Counts One and Twelve of this First Superseding Indictment, JAMES VEREEN, A/K/A BONE, was convicted of possession with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841, on or about December 20, 2006, in the United States District Court for the Southern District of Georgia, a serious drug felony, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment within 15 years of the commencement of the instant offenses.

Forfeiture

Upon conviction of the offenses alleged in Count One, Three through Seventeen, and Twenty of this First Superseding Indictment, the defendants,

JAMES VEREEN, A/K/A BONE,

shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations, including but not limited to, the following:

(a) MONEY JUDGMENT: A sum of money in United States currency representing the amount of proceeds obtained as a result of each offense, or conspiracy to commit such offense, alleged in Counts One Three through Seventeen, and Count Twenty of this First Superseding Indictment.

(b) CURRENCY:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

(c) FUNDS:

- a. \$546,693.39 in funds seized from the Wells Fargo bank account number ending in x1354.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

(d) VEHICLES:

a. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

(e) JEWELRY:

a. [REDACTED]

(f) FIREARMS:

a. [REDACTED]

[REDACTED]

Upon conviction of the offense alleged in Count Two of this First Superseding Indictment, the defendants,

[REDACTED]

[REDACTED]

[REDACTED]

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any property, real or personal, constituting or derived from proceeds traceable to said violation, including but not limited to, the following:

(a) MONEY JUDGMENT: A sum of money in United States currency representing the amount of proceeds obtained as a result of each offense, or conspiracy to commit such offense, alleged in Count Two of this First Superseding Indictment.

Upon conviction of one or more of the offenses alleged in Counts Eighteen, Nineteen, Twenty-One, and Twenty-Two of the First Superseding Indictment, the defendants,

[REDACTED]

[REDACTED]

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in or used in the commission of the offenses.

Upon conviction of one or more of the offenses alleged in Counts Twenty-Three through Twenty-Nine of this First Superseding Indictment, the defendants,

[REDACTED]
[REDACTED], AND
JAMES VEREEN, A/K/A BONE,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offenses, or any property traceable to such property, including, but not limited to, the following:

(a) MONEY JUDGMENT: A sum of money in United States currency, representing the amount of property obtained as a result of the offenses alleged in Counts Twenty-Three through Twenty-Nine of this First Superseding Indictment.

(b) FUNDS:

i. [REDACTED]
[REDACTED]

If, any of the property described above, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence,
- (b) has been transferred or sold to, or deposited with, a third party,
- (c) has been placed beyond the jurisdiction of the court,
- (d) has been substantially diminished in value, or

(e) has been commingled with other property which cannot be divided without difficulty,

the United States of America intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

A True BILL


FOREPERSON

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United States Attorney


JOHN T. DEGENOVA
Assistant United States Attorney
Georgia Bar No. 940689

Rebeca M. Ojeda
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